

DeMaria, Eva

From: MCCLINCY Matt <MCCLINCY.Matt@deq.state.or.us>
Sent: Wednesday, October 07, 2015 11:32 AM
To: DeMaria, Eva
Cc: Michael Allen (allenmc@cdmsmith.com); Sheldrake, Sean; 'tom@grafcon.us'; 'Brendan Robinson'; MCDONNELL Erin
Subject: RE: PEO revised BOD and RTC

Hi Eva,

DEQ appreciates EPA's review of the basis of design report, and we acknowledge that EPA continues to have reservations as noted in your email below. However, DEQ is comfortable moving forward with the barrier wall construction as designed. Erin has approved the design, and you should receive a copy of the approval letter.

EPA's review comments have focused on the adequacy of the length of the barrier wall and its ability to manage LNAPL. DEQ believes that it is important to point out that the DEQ proposed source control measure did not include LNAPL containment as a barrier wall objective. The objective of the wall was solely to lengthen the travel distance and time of the dissolved plume to provide for MNR. EPA did not raise concerns about the potential mobility of the LNAPL and the need to address it as part of their source control measure review. MMGL added LNAPL containment as an element of the design because of the potential to mobilize the residual LNAPL during air sparging. We agree with MMGL that monitoring for the presence of the LNAPL at the ends of the wall is an appropriate measure in this instance rather than lengthening the wall. As you and Erin have discussed, DEQ will work with MMGL to construct the monitoring well clusters as soon as practical. Should these wells detect LNAPL, there are a number of additional technologies that can be implemented relatively quickly to address migration of LNAPL should it become an issue. Also factored into our decision to approve construction of the wall is the fact that the wall construction contract is performance based, the status of the permeability testing, the nature of the environmental threat, and the likely hood of delaying construction until summer if we do not move forward now.

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From: DeMaria, Eva [mailto:DeMaria.Eva@epa.gov]
Sent: Friday, October 02, 2015 10:29 AM
To: MCDONNELL Erin
Cc: MCCLINCY Matt; Michael Allen (allenmc@cdmsmith.com); Sheldrake, Sean
Subject: PEO revised BOD and RTC

Erin-

EPA still has reservations about the design and timeline of the proposed project. PEO's response to comments did not fully address EPA's followon comments after the Sept. 9, 2015 conference call (attached). In particular, we remain concerned that the proposed wall is not long enough laterally to control migration of the LNAPL. In order to document that LNAPL and other contaminants are controlled, the cluster wells need to be immediately installed after construction of the GWBW and performance monitoring begun such that groundwater reference values may be obtained. The schedule is unclear as to when the cluster wells will be installed. Moreover, permeability testing needs to be appropriately conducted to ensure GWBW construction meets the hydraulic conductivity design specifications.

Please call or email if you have questions. I and our contractors are available for a followup conference call if necessary. Thanks.

Eva

Eva DeMaria

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From: MCCLINCY Matt [<mailto:MCCLINCY.Matt@deq.state.or.us>]

Sent: Monday, September 14, 2015 4:22 PM

To: 'tom@grafcon.us'

Cc: 'Brendan Robinson'; MCDONNELL Erin; LARSEN Henning; PARRETT Kevin; DeMaria, Eva; Sheldrake, Sean; 'Allen, Michael'

Subject: FW: EPA followon comments to PEO discussion on 9/15/15

Hi Tom,

EPA provided the attached "followon comments" to the BOD and pending 100% design report discussed during our conference call last week. Since Erin is out of the office this week, I am forwarding them along. Please let us know if we need to discuss any of the these.

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From: DeMaria, Eva [<mailto:DeMaria.Eva@epa.gov>]

Sent: Monday, September 14, 2015 10:58 AM

To: MCDONNELL Erin; MCCLINCY Matt

Cc: Sheldrake, Sean; Michael Allen (allenmc@cdmsmith.com)

Subject: EPA followon comments to PEO discussion on 9/15/15

Hi Erin-

We have a few followon comments that ERM and PEO can hopefully address before they submit their revised Basis of Design and other documents. Please forward to them. Feel free to call or email if you have questions. Thanks.

Eva

Eva DeMaria

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